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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Counsel for the United States and counsel for Defendant Rowland Marcus Andrade stipulate and jointly request that the deadline to file admitted exhibits under Criminal Local Rule 55-1, incorporating the requirements of Civil Local Rules 5-1(g) and 79-4(a), be extended by approximately one month to May 30, 2025.

Under Criminal Local Rule 55-1, the procedures in Civil Local Rules 5-1 and 79-4 govern the disposition of admitted exhibits after trial. Civil Local Rule 5-1(g) requires the parties to file admitted exhibits on the docket within ten (10) days of the trial verdict. The parties must file a joint certification

1 of counsel with the admitted exhibits. The verdict was returned in this case on March 12, 2025, and the  
2 Court extended the deadline to file trial exhibits by an additional 30 days, to April 21, 2025.

3 The parties request the extension to facilitate their coordination of the filing after joint review of  
4 the admitted exhibits. Because some of the exhibits contain personal identifiable information (“PII”) or  
5 other sensitive information, the parties need time to meet and confer regarding (1) whether such exhibits  
6 can be filed without redaction, (2) whether such exhibits should be redacted before filing, or (3) the  
7 appropriate extent of redactions. Due to the large number of admitted exhibits, the size and complexity  
8 of the exhibits, and the press of other business, the parties need additional time to address this issue.

9 IT IS SO STIPULATED.

10  
11 DATED: April 17, 2025

Respectfully submitted,

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13 PATRICK D. ROBBINS  
Acting United States Attorney

14  
15 /s/  
16 CHRISTIAAN HIGHSMITH  
DAVID WARD  
Assistant United States Attorneys

17 DATED: April 17, 2025

18  
19 By: /s/ With Permission  
20 MICHAEL J. SHEPARD  
KERRIE C. DENT  
CINDY A. DIAMOND  
DAINEC STEFAN  
21 Attorneys for Defendant ANDRADE

## [PROPOSED] ORDER

Based upon the stipulation of the parties, and for good cause shown, the Court hereby extends the deadline for the parties to file the admitted trial exhibits until May 30, 2025.

IT IS SO ORDERED.

Dated: April \_\_\_, 2025

HONORABLE RICHARD SEEBORG  
United States Chief District Judge